REMARKS:

This Amendment is in response to the Office Action dated May 3, 1999. Claims 1-13 are pending in the present application. Independent claims 1, 7 and 11 have been amended, and claims 1-13 remain pending.

The Examiner objected to Figures 4-5, 7A-B, 8A-C, and 9A-B and requires legends. It is respectfully submitted that legends are not necessary for understanding of the drawings, as names for the numbered elements are clearly provided in the Specification and are consistent throughout the drawings. In describing Figures 7A-B for example, the Specification states that numeral 402 denotes the camera's display, numerals 430 and 432 denote overlay bars, numerals 412a-c denote soft keys, numerals 410a-c denote soft key labels, numeral 409 denotes a four-way controller, and numerals 413 and 415 already have legends.

Independent claims 1, 7, and 11 have been amended to recite a "digital camera", rather than a digital imaging device, to make clear the device is portable. The claims have also been amended to make clear that the script is stored and run within the digital camera.

The Examiner rejected claims 1-13 under 35 U.S.C. §103 as obvious over European Patent No. 661,658 A2 issued to Parulski in view of U.S. Pat. No. 5,198,851 issued to Ogawa. Applicants respectfully disagree.

Parulski is directed to a PC-based system that allows a user to make a personalized video game. The system us located in a retail establishment and includes what appears to be a PC that includes a display processor, integrated CD disc reader, and keyboard. Connected to the PC is a camera, printer, and CD disk writer. In operation, once a user has selected a game to personalize, a store operator selects a personalization plan. The instruction plan, which may be accessed by

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the processor, directs the operator to take four different pictures of the customer for incorporation in the video game.

Ogawa is directed to a system for transmitting data to and from a camera with a pocket computer or electronic organizer (terminal device). The terminal device includes a display, keyboard, and an IC card. The IC card includes a program that display information on the terminal device, such as an "electronic manual".

In contrast to the references, the amended claims of the present invention are directed to a digital camera that is capable of guiding a user through a series of related image captures. Niether Parulski or Ogawa teach a system in which scripts are stored and executed within a portable device, such the digital camera recited in the amended claims.

Parulski, in contrast, teaches that the personalization plan that guides the operator is accessed by a processor that is located in a PC and fixed with the store. Once the plan is accessed by the processor, the instructions are presumably displayed on the PC's display, rather than on the camera. This is because in Parulski's system, the camera does not include a display, as called for by the claims of the present invention.

Ogawa is cited for teaching "interactive instructions." Ogawa's camera is not tethered to fixed PC as in Parulski. However, Ogawa's camera requires the addition of an external terminal device that accepts programs from an IC card and displays instructions on a display on the terminal device. Assuming a script was included on Ogawa's IC card, the script would not be transferred to, or executed, on the camera (Ogawa does not even teach that the camera is capable of executing programs or scripts, let alone executing "directed image capture sequences"). Therefore, the program instructions from the script would not be "stored" in the "digital camera",

would not be "executed" on the digital camera, nor would instructions to the user be displayed on the digital camera's "display", as recited in claim 1.

In addition, the terminal device in Ogawa is used to set camera operational conditions, however, the information display on the terminal is not believed to be "interactive". That is, the terminal device displays static camera setting information or operational directions that the user may follow step-by-step, which is not interactive. In fact, one purpose of the present invention is to eliminate the display of such PC-type "help screens" (Specification, page 5). Applicants could find no teaching or suggestion in Ogawa that the instructions displayed on the terminal device's are "automatically updated" "in response to the user performing the specific operations', as recited in claim 1.

It is also submitted that a combination of Parulski and Ogawa would fail to teach or suggest the features of the claimed invention. Adding the teaching of Ogawa to Parulski would add nothing more to Parulski since Parulski's computer system that stores and displays the personalization plan is analogous to Ogawa's terminal device and IC card. And adding Parulski to Ogawa would defeat the purpose of Ogawa's terminal device, which to eliminate the use of a PC to exchange data with the camera (Col. 1, lns. 14-20).

With respect to claim limitations in claims 7, 3, 4 regarding "text-based" scripts, the Examiner stated that "text-based script programming languages, such as Java, are notoriously well-known in the art." However, Examiner could point to no such references where Java scripts are interpreted by a portable digital camera. In addition, the Examiner appears to misunstand the meaning of "interpreted". As described in the Specification, in contrast to a traditional application program, an interpreted language is one in which non-compiled text commands are

executed one-by-one by a processor. An application program on the other hand is written in a traditional computer language, such as C++, compiled, and stored in machine language, which is a more complicated process than adding new functions to the camera via a text-based interpreted script, as claimed in the present invention.

In view of the foregoing, it is submitted that independent claims 1, 7, and 11 are allowable over the cited references, and the dependent claims are allowable because they are dependent upon the allowable independent claims. Accordingly, Applicant respectfully requests reconsideration and passage to issue of claims 1-13 as now presented.

Applicants' attorney believes that this Application is in condition for allowance. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

Respectfully submitted,

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